

Robert A. Julian (SBN 88469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
San Francisco, CA 94111
Telephone: 628.208.6434
Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
David J. Richardson (SBN 168592)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
Los Angeles, CA 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: drichardson@bakerlaw.com
Email: lattard@bakerlaw.com

Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF LAUREN T.
ATTARD IN SUPPORT OF RESPONSE
OF OFFICIAL COMMITTEE OF TORT
CLAIMANTS TO DEBTORS'
RESTATED RESTRUCTURING
SUPPORT AND SETTLEMENT
AGREEMENT WITH THE
CONSENTING SUBROGATION
CLAIMHOLDERS [DKT NO. 4554-1]**

1 LAUREN T. ATTARD, under penalty of perjury, declares:

2 1. I am an associate at Baker & Hostetler LLP, counsel to the Official Committee of
3 Tort Claimants (the “TCC”) of PG&E Corporation and Pacific Gas and Electric Company (the
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the TCC’s response to the Debtors’ restated
6 Restructuring Support and Settlement Agreement with the Consenting Subrogation Claim Holders.

7 3. Attached hereto as EXHIBIT A is a true and correct copy of a report issued by the
8 California Department of Insurance, “North Bay Insured Losses from the October 2017 Wildfires,”
9 dated May 18, 2018, which this firm obtained from the California Department of Insurance website,
10 www.insurance.ca.gov, but no longer appears to be available on the website. This report states that
11 the direct incurred losses for the 2017 North Bay Wildfires is \$9,731,079,051.

12 4. Attached hereto as EXHIBIT B is a true and correct copy of the report issued by
13 the California Department of Insurance, “North Bay Insured Losses from the October 2018
14 Wildfires,” dated April 30, 2019, available at [http://www.insurance.ca.gov/0400-news/0100-](http://www.insurance.ca.gov/0400-news/0100-pressreleases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf)
15 [pressreleases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf](http://www.insurance.ca.gov/0400-news/0100-pressreleases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf). The report states
16 that the Direct Incurred Losses for the 2018 Camp Fire (Butte) is \$8,473,363,059. This figure
17 combined with the 2017 North Bay Wildfires above yields approximately \$18.2 billion.

18 5. Attached hereto as EXHIBIT C is the Motion of the Ad Hoc Group of Subrogation
19 Claim Holders to Terminate the Debtors’ Exclusive Periods Pursuant to Section 1121(d)(1) of the
20 Bankruptcy Code, dated July 23, 2019 (Dkt. No. 3147).

21 6. Attached hereto as EXHIBIT D is the Debtors’ Designation of Claims Filed by the
22 United States of America, the State of California and Adventist Health System as Unliquidated and
23 Subject to Estimation Under Section 502(c) of the Bankruptcy Code, dated November 1, 2019 (Dkt.
24 No. 4553). The claims listed in this designation add up to approximately \$8.6 billion.

25 7. Attached hereto as EXHIBIT E is a true and correct copy of a portion of the
26 transcript from the Estimation Status Conference on October 28, 2019 in the District Court.

27 8. Attached hereto as EXHIBIT F is a true and correct copy of a portion of PG&E’s
28 Form 10-Q for the period ended September 30, 2019.

9. Attached hereto as **EXHIBIT G** is a true and correct copy of a portion PG&E's Form 8-K, dated June 18, 2019.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: Los Angeles, CA
November 8, 2019

/s/ Lauren T. Attard
Lauren T. Attard